

# LITCHFIELD CAVO LLP

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October 4, 2023

**Via ECF**

Honorable Kenneth M. Karas, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

**Re: *Helder Ramirez v. IDD Cars, LLC, et al.***  
**Case No. 23 CV 05716 (KMK)**

Dear Judge Karas:

Litchfield Cavo, LLP represents Defendant American Heritage Federal Credit Union in the above-referenced matter. Per your Honor's September 25, 2023 Calendar Notice, an initial conference in this matter has been scheduled for tomorrow, Thursday, October 5, 2023 at 10:30 a.m.

I am writing at this time to request an adjustment to the start time for the conference tomorrow or a short adjournment to another day. I am currently engaged in a trial in the Bronx County Civil Court that commenced this past Monday and, for all intents and purposes, really ought to have been completed by now. As it stands, I am due back in court tomorrow morning at 9:30. If it is okay with your Honor and counsel, I would be happy to participate in the conference tomorrow anytime between 1:00-2:00, which is when we the court has been breaking for lunch. Alternatively, I am available any time next week on either October 9, 11, 12 or 13.

I apologize for any inconvenience this might cause as it is truly not my intention to delay the case unnecessarily. Thank you for your consideration of this matter.

*The conference is moved to  
1:30 pm.*

Respectfully submitted,

*/s/ Brian S. Gitnik*

Brian S. Gitnik

cc: All counsel of record (via ECF)

*10/4/23*